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Attorneys for Defendant Humm Kombucha LLC

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

TABATHA LAWLEY, an individual;

Case No. 6:23-cy-00170

v.

HUMM KOMBUCHA LLC, an Oregon Domestic Limited Liability Company

Defendants.

Plaintiff,

DEFENDANT'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

LOCAL RULE 7-1 CERTIFICATION

The undersigned certifies that Defendant Humm Kombucha LLC's counsel has conferred with Plaintiff Tabatha Lawley's counsel regarding this Motion, and Plaintiff does not oppose this Motion.

MOTION

Pursuant to L.R. 16-3 and Fed. R. Civ. P. 6(b)(1)(A), Defendant Humm Kombucha LLC ("Humm Kombucha"), moves this Court for an order to extend its time to file a response to Plaintiff Tabatha Lawley's ("Plaintiff") Complaint in this matter. There is good cause for this extension because it will allow the parties additional time to continue discussions surrounding a possible resolution of this matter.

Humm Kombucha previously filed an unopposed motion to extend its time to file a response to the Complaint by 32 days on February 24, 2023. ECF No. 11. The Court granted that motion, and therefore Humm Kombucha's response to the Complaint is currently due on April 3, 2023. Humm Kombucha requests a further 21-day extension, up to and including **April 24, 2023**, to file a response to the Complaint.

Counsel for Humm Kombucha conferred with counsel for Plaintiff regarding this Motion, and Plaintiff does not oppose this Motion. The requested extension will have no impact on any existing deadlines, settings, or schedules in this matter and this request has not been submitted

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for the purposes of delay. Accordingly, Humm Kombucha respectfully requests that the Court grant this Motion.

DATED March 28, 2023.

Respectfully submitted,

K&L GATES LLP

By: <u>/s/ Elizabeth H. White</u>

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2023, I served the forgoing document on all parties and counsel of record via the CM/ECF system.

DATED: March 28, 2023. By: /s/ Elizabeth H. White

Elizabeth H. White OSB #204729